

REMARKS

This paper is in response to the Office Action dated December 15, 2005. The due date for response extends to March 15, 2006. Please amend claims 1, 3, 14, 18, and 20. Claims 1-28 are pending after entry of this Proposed Amendment. Claims 1-28 stand rejected.

Rejections under 35 USC §103

Claims 1-28 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Babin* (U.S. 6,411,517) in view of *Kurek, III* (U.S. 6, 394,509). The rejection is traversed, and Applicants request reconsideration.

In regard to independent amended claim 1, *Babin* teaches a system 22 for removably connecting a circuit card 54 to an electronic device, which comprises a sliding component 28, a guiding edge 32, a channel 26, a connector 20, and a lever 40. The circuit card 54 is mounted on the sliding component 28. Once the sliding component 28 is fully inserted with the recesses 58 in register with the connection sockets (or connector) 20, the lever 40 is manually pivoted downwardly to a locked position wherein the auxiliary plate 34 is lowered until suitable connection is made between the circuit card and the connector 20. (See, Figures 2 and 5-7, and their accompanying description) *Babin* does not teach “a clocked gear assembly coupled to the component mounting frame, the clocked gear assembly configured to enable movement of the component collar in at least two substantially perpendicular directions to actively enable the component,” as described in independent claim 1. *Babin* does not teach a clocked gear (assembly). In addition, the lever 40 is used to lower the auxiliary plate 34, which means it only moves the auxiliary plate 34 in one direction, not in at least two substantially perpendicular directions.

Kurek, III teaches a latch for installing and removing a disk drive from an enclosure. The latch comprises an actuator (40, 140), which includes a pair of pinions (42, 142) in meshing engagement with teeth on the guiding members (14,16) for moving the disk drive in a linear direction (60, or opposite direction 64). (See, abstract, Figures 1-3, and their accompanying description) The pair of pinions (or gears) (42, 142) described by *Kurek, III* only enable movement in one direction and does not enable the movement of any component in at least two substantially perpendicular directions. To establish a *prima facie* case of obviousness, the prior art references must teach or suggest all the claim limitations (See, MPEP2143). Here, in view of the incorrect characterization of *Babin* and *Kurek, III*, the

references as combined do not teach all the features of the claim 1. Therefore, Applicants submit that claim 1 is patentable over *Babin* in view of *Kurek, III*, and request the withdrawal of its rejection.

In regard to claim 2, claim 2 is a dependent claim of independent claim 1. Based on the argument described above for claim 1, claim 2 is patentable over *Babin* in view of *Kurek, III*. In addition, *Babin* does not teach “a vertical rack gear on the component collar; a horizontal rack gear on the component collar; a vertical clocked gear in the clocked gear assembly; a horizontal clocked gear in the clocked gear assembly,” as defined in claim 2. Additionally, contrary to Examiner’s statement that lever 40 of *Babin* enables movement in the vertical and horizontal directions, lever 40 of *Babin* is provided for lowering the mating edge 56 of the extension card (54) until suitable connection is made between the card connector and the connector (20) and only enables movement in one linear direction (vertical). (See, abstract and column 5, lines 36-43) Therefore, *Babin* does not teach “a lever for controlling the vertical clocked gear and the horizontal clocked gear, wherein the vertical rack gear meshes with the vertical clocked gear to enable movement of the component collar in a first direction and the horizontal rack gear meshes with the horizontal clocked gear to enable movement of the component collar in a second direction” as described in claim 2.

Kurek, III teaches a pair of pinions (42, 142) in meshing engagement with teeth on the guide members (14, 16) for moving the disk drive in a linear direction (60, 64). (See, abstract and column 3, lines 30-67) The pinions (42, 142) can only move the disk drive in a linear direction 60 (or opposite direction 64), therefore, the pinion (42, 142) can either be a vertical rack gear or a horizontal rack gear, but cannot be both a vertical and a horizontal rack gears at the same time. The clocked gears (42, 142) near 14, 16, and 44 move the block 44 and guide members (14, 16) in linear direction 60 (or opposite direction 64) and do not move these components in two non-linear directions (horizontal and vertical). (See, abstract and column 3, lines 30-67) Therefore, *Kurek, III* does not teach all the missing elements (or features) of *Babin* in regard to claim 2. *Babin* and *Kurek, III* as combined do not teach all the features of the claim 2. The case of obviousness is not established. As a consequence, Applicants submit that claim 2 is patentable over *Babin* in view of *Kurek, III*, and request the withdrawal of its rejection.

In regard to claim 3, claim 3 is a dependent claim of independent claim 1. Based on the argument described above for claim 1, claim 3 is patentable over *Babin* in view of *Kurek, III*.

In regard to claim 4, claim 4 is a dependent claim of independent claim 1. Based on the argument described above for claim 1, claim 4 is patentable over *Babin* in view of *Kurek, III*. In addition, neither *Babin* nor *Kurek, III* teaches “the lever includes a first pin to engage the vertical clocked gear, the vertical clocked gear having a first slot for receiving the first pin, and the lever includes a second pin to engage the horizontal clocked gear, the horizontal clocked gear having a second slot for receiving the second pin,” as defined in claim 4. The pin 22 of *Kurek, III* is a guide support that extends from an outer surface of each of the guide members 14, 16 proximate the second end. Pin 22 does not engage either the vertical clocked gear or horizontal clocked gear. Pin 41 of *Kurek, III* helps to attach lever 40 to block 44. Pin 41 also does not engage either the vertical clocked gear or horizontal clocked gear. Therefore, *Babin* and *Kurek, III* as combined do not teach all the features of the claim 4. The case of obviousness is not established. As a consequence, Applicants submit that claim 4 is patentable over *Babin* in view of *Kurek, III*, and request the withdrawal of its rejection.

In regard to claim 5, claim 5 is a dependent claim of independent claim 1. Based on the argument described above for claim 1, claim 5 is patentable over *Babin* in view of *Kurek, III*. In addition, neither *Babin* nor *Kurek, III* teaches “movement of the lever through a first segment of the arc causes the first pin to engage the first slot to move the vertical clocked gear and movement of the lever through a second segment of the arc causes the second pin to engage the second slot to move the horizontal clocked gear,” as defined in claim 5. As described above, pins 22 and 41 do not engage either the vertical clocked gear or horizontal clocked gear. Therefore, *Babin* and *Kurek, III* as combined do not teach all the features of the claim 5. The case of obviousness is not established. As a consequence, Applicants submit that claim 5 is patentable over *Babin* in view of *Kurek, III*, and request the withdrawal of its rejection.

In regard to claim 6, claim 6 is a dependent claim of independent claim 1. Based on the argument described above for claim 1, claim 6 is patentable over *Babin* in view of *Kurek, III*. . In addition, neither *Babin* nor *Kurek, III* teaches “the first pin disengages from the first slot and the second pin engages the second slot at a cross-over point,” as defined in claim 6. *Kurek, III* does not teach pin 22 disengaging from the first slot and

pin 41 engaging the second slot at a cross-over point. As a matter of fact, *Kurek, III* does not teach a cross-over point. Therefore, *Babin* and *Kurek, III* as combined do not teach all the features of the claim 6. As a consequence, Applicants submit that claim 6 is patentable over *Babin* in view of *Kurek, III*, and request the withdrawal of its rejection.

In regard to claim 7, claim 7 is a dependent claim of independent claim 1. Based on the argument described above for claim 1, claim 7 is patentable over *Babin* in view of *Kurek, III*. In addition, neither *Babin* nor *Kurek, III* teaches “the arc is defined by approximately 90 degrees, the first segment being defined by approximately 45 degrees and the second segment being defined by approximately 45 degrees,” as defined in claim 7. *Kurek, III* teaches the lever (or handle) 40 is rotated between an open position shown in FIG. 3 and a dosed position, for example, generally 90.degree.-180.degree. from its closed position, which is illustrated in dotted lines. (See, column 3, lines 53-56) *Kurek, III* does not teach the first and second segments being approximately 45 degrees. Therefore, *Babin* and *Kurek, III* as combined do not teach all the features of the claim 8. As a consequence, Applicants submit that claim 8 is patentable over *Babin* in view of *Kurek, III*, and request the withdrawal of its rejection.

In regard to claim 8, claim 8 is a dependent claim of independent claim 1. Based on the argument described above for claim 1, claim 8 is patentable over *Babin* in view of *Kurek, III*. In addition, neither *Babin* nor *Kurek, III* teaches “movement of the component in a first direction is configured to enable insertion of the component device into an array of component devices and movement of the component in a second direction is configured to enable connection of the component to a board connector,” as defined in claim 8. Component 12 of *Kurek, III* is a disk drive support. *Kurek, III* does not teach the disk drive support 12 is being inserted into an array of component devices. *Kurek, III* also does not teach board connector. The Examiner’s characterization of disk drive support 12 is incorrect. Therefore, *Babin* and *Kurek, III* as combined do not teach all the features of the claim 8. As a consequence, Applicants submit that claim 8 is patentable over *Babin* in view of *Kurek, III*, and request the withdrawal of its rejection.

In regard to independent claim 9, *Babin* does not teach “the component collar having a first rack gear and a second rack gear, as defined in claim 9. *Babin* also does not teach “a clocked gear assembly,” as defined in claim 9.

Kurek, III teaches a latch for installing and removing a disk drive from an enclosure.

Kurek, III teaches a pair of pinions 42 coupled to the frame body 32. As described above in argument for claim 1, the pair of pinions 42 described by *Kurek, III* only enables movement in one linear direction (60 or 64). *Kurek, III* does not teach “movement of the component collar in a second direction upon release of the clocked gear assembly by first rack gear and engagement of the second rack gear to the clocked gear assembly,” as defined in claim 9. The clocked gears (42, 142) near 14, 16, and 44 of *Kurik, III* engage either simultaneously or independently. Each of gears 42 (or 142) does not engage after one of the gears is released. To establish a *prima facie* case of obviousness, the prior art references must teach or suggest all the claim limitations (See, MPEP2143). Here, in view of the incorrect characterization of *Babin* and *Kurek, III*, the references as combined do not teach all the features of the claim 9. Therefore, Applicants submit that claim 9 is patentable over *Babin* in view of *Kurek, III*, and request the withdrawal of its rejection.

Claims 10-13 are dependent claim of independent claim 9. Based on the argument described above for claim 9, Applicants submit that claims 10-13 are patentable over *Babin* in view of *Kurek, III*, and request the withdrawal of their rejections.

In regard to independent claim 14, *Babin* does not teach “a clocked gear assembly,” as defined in claim 14. *Kurek, III* teaches a pair of pinions (or clocked gears) 42. As described above in argument for claim 1, the pair of pinions 42 described by *Kurek, III* only enables movement in one linear direction (60 or 64). *Kurek, III* does not teach “a clocked gear assembly configured to enable movement of the computer component in each of a first direction and a second direction, wherein the computer component mounting device provides for positioning the computer component in the first direction and for positioning the computer component in the second direction and the second direction is substantially perpendicular to the first direction.” *Babin* and *Kurek, III* as combined do not teach all the features of the claim 14. Therefore, Applicants submit that claim 14 is patentable over *Babin* in view of *Kurek, III*, and request the withdrawal of its rejection.

Claims 15-17 are dependent claim of independent claim 14. Based on the argument described above for claim 14, Applicants submit that claims 15-17 are patentable over *Babin* in view of *Kurek, III*, and request the withdrawal of their rejections.

In regard to independent claim 18, *Babin* does not teach “a carrier blade capable of receiving a plurality of computer devices and further configured to arrange the plurality of computer devices in at least one array of computer devices,” as defined in claim 18. As

discussed above in argument for claim 1, *Babin* also does not teach “a clocked gear assembly capable of positioning the computer device in each of a first direction and a second direction, wherein the second direction is substantially perpendicular to the first direction,” as defined in claim 18.

Kurek, III teaches a pair of pinions (or clocked gears) 42. As described above in argument for claim 1, the pair of pinions 42 described by *Kurek, III* only enables movement in one linear direction (60 or 64). *Kurek, III* does not teach “a clocked gear assembly capable of positioning the computer device in each of a first direction and a second direction, wherein the second direction is substantially perpendicular to the first direction,” as defined in claim 18. *Babin* and *Kurek, III* as combined do not teach all the features of the claim 18. Therefore, Applicants submit that claim 18 is patentable over *Babin* in view of *Kurek, III*, and request the withdrawal of its rejection.

Claim 19 is a dependent claim of independent claim 18. Based on the argument described above for claim 18, Applicants submit that claim 19 is patentable over *Babin* in view of *Kurek, III*, and request the withdrawal of its rejection.

In regard to independent claim 20, based on the same argument used for independent claim 18, Applicants submit that claim 19 is patentable over *Babin* in view of *Kurek, III*, and request the withdrawal of its rejection.

Claim 21 is a dependent claim of independent claim 20. Based on the argument described above for claim 20, Applicants submit that claim 21 is patentable over *Babin* in view of *Kurek, III*, and request the withdrawal of its rejection.

In regard to independent claim 22, *Babin* does not teach “a first gear,” and “a second gear positioned on the collar and proximate to the first gear,” as defined in claim 22. *Kurek, III* teaches gear 42, but *Kurek, III*, does not teach “a second gear positioned on the collar and proximate to the first gear,” as defined in claim 22. The two gears 42 are not proximate each other (See, Figure 3). *Babin* and *Kurek, III* as combined do not teach all the features of the claim 22. Therefore, Applicants submit that claim 22 is patentable over *Babin* in view of *Kurek, III*, and request the withdrawal of its rejection.

Claims 23-28 are dependent claim of independent claim 22. Based on the argument described above for claim 22, Applicants submit that claims 23-28 are patentable over *Babin* in view of *Kurek, III*, and request the withdrawal of their rejections.

In consequence, Applicants respectfully request withdrawal of the rejection to claims 1-28. Applicants request that claims 1-28 be indicated to be allowable. A notice of allowance is respectfully requested. If the Examiner has any questions concerning the present amendment, the Examiner is kindly requested to contact the undersigned at (408) 774-6924. If any other fees are due in connection with filing this amendment, the Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No. SUNMP355). A duplicate copy of the transmittal is enclosed for this purpose.

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